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**Department of Health and Family Services**

Date: January 2, 2004 DSL-BQA-04-001

To: Nursing Homes NH 01  
Facilities for the Developmentally Disabled FDD 01  
Hospices HSPCE 01  
Hospitals HOSP 01  
Ambulatory Surgical Centers ASC 01

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cc: Susan Schroeder, Director  
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**Alcohol-Based Hand Sanitizers**

The Department is providing this position statement regarding the installation or placement of alcohol-based hand sanitizer products in health care facilities.

This memorandum takes into account the following:

- (1) October 25, 2002, the Centers' for Disease Control (CDC) issued "Guideline for Hand Hygiene in Health-Care Settings" in which it states: "Hand-washing is effective for infection control and the use of alcohol-based hand sanitizers supplements an overall plan to reduce nosocomial infections." Since alcohol-based hand sanitizer products are flammable, they must comply with pertinent fire and life safety codes.
- (2) August 22, 2003 the American Society for Healthcare Engineering (ASHE) "Alcohol-Based Hand Rub Solution – Fire Modeling Analysis Report." The report endorses further research on this topic, as does the Department.
- (3) September 15, 2003 the CDC issued "Alcohol-Based Hand-Rubs and Fire Safety CDC Update." It states: "Healthcare organizations are encouraged to install dispensers in patient rooms, treatment rooms, suites and other appropriate locations (not in egress corridors). Existing national fire codes permit hand-rub dispensers in patient rooms, but prohibit their installation in egress or exit corridors."
- (4) Centers for Medicare and Medicaid Services (CMS) position that alcohol sanitizer

(5) Life Safety Code NFPA 101 Section 8.4.3.2 states: “No storage or handling of flammable liquids or gases shall be permitted in any location where such storage would jeopardize egress from the structure.”

(6) NFPA 30 Flammable and Combustible Liquids Code and the International Building Code (IBC) Section 307 limit storage of the product per the following:

- NFPA 30 Institutional Occupancies section 4.5.5.3 limits not more than 10 Gal (37.8 L) of Class I and Class II liquids combined shall be stored in a single fire area outside of a safety cabinet or storage area.
- NFPA 30 Institutional Occupancies section 4.5.5.4 limits not more than 25 Gal (95 L) of Class I and Class II liquids combined shall be stored in a single fire area inside safety cans outside of a storage area or storage cabinet.
- NFPA 30 section 4.5.1.4 prohibits storage of Class I liquids in basements.

After a review of the current resources, the Department has developed the following position:

**Alcohol-based hand sanitizer dispensers shall not be installed in egress corridors.**

Placement of dispensers should be isolated from high temperature or ignition sources such as but not limited to the following: electrical switches, electrical receptacles, electrical equipment, hot plumbing lines or valves, and open flame sources.

Alcohol-based hand sanitizer products do not substitute for plumbing fixture requirements in the International Building Code (IBC) ch. 29 or Uniform Plumbing Code Comm ch. 81-87.

Temporary exceptions for alcohol-based hand sanitizer products are allowable for emergency infectious agent outbreaks that the Wisconsin Division of Public Health and the Division of Disabilities and Elderly Services deem a health hazard.

Facilities are encouraged to assess their resources against the needs of their patients and may have specific practices that place additional restrictions on the location or use of these products, for example, but not limited to, children or adolescent treatment areas and treatment areas for persons with a developmental disability. Issues such as ingestion or ignition of the alcohol residual gases may necessitate additional restrictions or supervision.